

**ANALYSIS OF MUNICIPAL DEVELOPMENT PLANS AND
INTEGRATED URBAN RECONSTRUCTION AND
DEVELOPMENT PLANS OF MUNICIPALITIES
PARTICIPATING IN ROMACT**

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Abbreviations

CAG – Community Action Group

IURDP – Integrated Urban Reconstruction and Development Plans

MDP – Municipal Development Plan

MRDPW - Ministry of Regional Development and Public Work

NRIS – National Roma Integration Strategy

NAMRB - National Association of Municipalities in Republic of Bulgaria

NGO – Non-Governmental Organisation

SME – Small and Medium Enterprise

Executive Summary

The implementation of ROMACT Programme in Bulgaria implies joint planning with the participation of local communities, revision and update of strategies and plans for Roma inclusion, as well as their integration into the mainstream municipal development strategies and plans (MDPs). The latter has been a challenge in Bulgaria, since the planning for Roma has been kept separated from the mainstream planning of the local administrations. Moreover, the present brief study shows the challenges at the level of understanding and adoption of local (participatory) planning, the weakness of the process and of its accountability demarches.

While the MDPs should be key local strategic documents, in line with national policy for regional development and the budget plans of the EU Structural and Cohesion Funds, the fact that they do not include the measures to address the social inclusion of marginalized communities (these being included in parallel documents), makes it difficult to provide the necessary financial resources to address the needs of these communities.

This study shows that a very high number of MDPs are prepared by external consultancy firms, with limited involvement of the local authorities' experts and of the civil society structures (including Roma). This lack of involvement has also consequences on the MDPs monitoring and evaluation processes, the representatives of the local authorities, the local institutions and the NGOs having poor knowledge about these strategic documents. The strategies have no clear baseline quantitative indicators, nor quantitative expectations of the results achieved at the mid-term stage or the desired status at the end of the planning period. A big number of MDPs covered by this study, do not contain a proper analysis of problems and needs of the Roma communities, nor of the factors that led to the persisting problems of these groups. Measures for social development and integration of vulnerable communities are formulated too broadly with no concrete actions proposed. The National Roma Integration Strategy (NRIS) is in most of the cases not included in the list of mandatory strategic documents to be complied with when developing the regional and local development plans. Moreover, the MDPs tend to be inconsistent in terms of content throughout and have no clear links with different strategies, plans and regulations at national, regional and European level.

With this perspective, at the time of the new programming and strategic planning period in Bulgaria, the study highlights the fact that there is an increasing risk of missing to plan and finance necessary measures aimed at integrating vulnerable persons and groups, including the Roma.

Notwithstanding, there is a need for mandating relevant staff at municipal level to work on the strategic documents that concern the local authority and to improve the capacity of the specialists at municipal level to elaborate, monitor and evaluate the implementation of the municipal plans, especially in defining good quantitative impact and result indicators.

The present report is intended to contribute to the work on mainstreaming of the issues of the vulnerable and marginalized communities, including Roma, in the strategies and plans of municipalities in Bulgaria. The findings contained by the report are to inform the advocacy efforts for policy development, at the level of relevant institutions in Bulgaria.

1. Introduction

1.1. Preliminary hypotheses and rationale for the study

The municipalities participating in the ROMACT Programme in Bulgaria are not responding to the efforts of the Programme's experts to update their Municipal Development Plans (MDPs) with the priority needs and measures of the Roma communities, proposed by the Community Action Groups (CAGs), despite the requirement of the MDPs to be open and dynamic documents, possible to be revised in accordance with changes in the economic, social and regulatory environment. Moreover, the MDP is a key strategic document at local level, in line with the national policy for regional development and the budget plans of EU Structural and Cohesion Funds for implementing the long-term strategy "Europe 2020". The lack of measures in the MDPs to address the social inclusion of marginalized groups, living in the territories of the municipalities, makes it difficult to provide the necessary financial resources for these activities despite the adoption of separate municipal plans for their integration.

The ROMACT National Team in Bulgaria assumes that there are certain difficulties that restrict or prevent municipalities from conducting specific analysis and assessment of the needs and problems of the marginal groups on their territories. Respectively, they also have difficulties for prioritizing and defining objectives, tasks and projects for addressing those needs and problems. Therefore, this research has the following objectives and tasks:

1.2. Main goal

To identify the difficulties that are limiting the municipalities to include in their MDPs (and also in the Integrated Urban Reconstruction and Development Plans, where available) adequate analysis of the problems of the population at risk of social exclusion and marginalization, the factors that increase this risk and its sustainable impact, as well as adequate priorities to address the issues of marginalization.

1.3. Objectives

- to analyze the municipal development plans of municipalities participating in the ROMACT program;
- to analyze the Integrated Urban Reconstruction and Development Plans (IURDP) of municipalities participating in ROMACT to find out whether Roma neighborhoods / streets have been included / planned in the impact areas identified for integrated measures under IURDP;
- to gather up-to-date reliable information on human resource and administrative, institutional, regulatory and other barriers that prevent municipalities from addressing the problems of marginal groups through their MDPs;
- to formulate a set of recommendations based on the findings of the survey;

The present report is intended to contribute to the work on mainstreaming of the issues of vulnerable and marginalized communities, including Roma, in the strategies and plans of municipalities in Bulgaria. The findings contained by the report are to inform the relevant advocacy efforts for policy development, in cooperation with the Ministry of Regional Development and Public Work (MRDPW) and the National Association of Municipalities in Republic of Bulgaria (NAMRB).

1.4. Subject of the survey: the Municipal Development Plans 2014 - 2020 of the municipalities participating in the ROMACT Programme, as well as the Integrated Plans for Urban Reconstruction and Development of the surveyed municipalities for the same period (in the cases where this applied).

1.5. Methodology

1.5.1. Sampling Methodology

This research studies the MDPs and the IURDPs of municipalities participating in or applying to the ROMACT Programme. These are the following municipalities: Aytos, Belovo, Boychinovtsi, Borovan, Botevgrad, Bratsigovo, Byala Slatina, Vetovo, Varbitza, Dobrich, Dryanovo, Zavet, Ispereh, Kaolinovo, Krivodol, Lukovit, Maglizh, Nikola Kozlevo, Novi Pazar, Peshtera, Samokov, Samuil, Septemvri, Sliven, Slivo Pole, Sopot, Sredets, Sungurlare, Tvarditsa, Tundzha, Cherven Bryag, Shabla, Shumen.

1.5.2. Registration methodology

1.5.2.1. Analysis of documents

This research explores the following documents: the Municipal Development Plans of the 33 municipalities mentioned above; their updated MDPs for 2017-2018 (as published on the municipalities' websites); latest reports on their implementation; IURDPs of the municipalities of Dobrich, Sliven and Shumen, which are also subject of the survey; regulatory acts for strategic planning of sustainable local development; previous studies of municipal development plans and classifications of municipalities with a view to clarifying the methodology of their preparation and its impact on the preparation of the new plans.

The questions used in the survey were as following:

- Are vulnerable ethnic groups included in the analytical part of MDPs and are there specific, concrete analysis and assessment of their needs?
- Are the factors for persisting problems and difficulties for marginalized persons and groups identified?
- Are there any data about the problems / opportunities for the integration of vulnerable ethnic groups at micro-territorial level, especially for ghettoised areas, segregated neighborhoods, Roma neighborhoods etc .?
- Are there defined strategic goals / objectives / priorities, activities and measures addressing social exclusion and marginalization, including the Roma population in these Plans?
- Are there specific projects in the programs for implementation of the MDPs to address the priorities of the marginalized groups or for the social inclusion of marginalized groups, ethnic minorities and / or for the integration of ethnic minorities / Roma etc.?
- Is there a logical link between the analysis, the objectives, priorities, measures / action plans and budgets?

1.5.2.2. Semi-structured interviews with experts and representatives of local authorities

The purpose of using interviews with experts was to examine the procedure for involving representatives of the Roma community, civil society structures and local government experts and institutions when developing the MDPs, their interim evaluation, ongoing monitoring and implementation. Moreover, this approach was expected to determine if there were possible institutional, regulatory and other obstacles for municipalities to include the priorities of vulnerable ethnic communities in the MDPs. The personal opinion/assessment of the interviewees about the implementation of the MDPs and other local strategy papers for integration of vulnerable groups, including Roma, was also recorded in order to make a comparison with the opinion given by the evaluators of the MDPs in their -interim assessments.

Eleven semi-structured interviews were held with experts / specialists from different institutions and representatives of the local authorities: a deputy mayor of Tundzha municipality; the Chair of Municipal Council of Nikola Kozlevo; two heads of departments and two experts from both municipalities; the Principal of the school, the Director of Chitalishte (Culture Center), the Principal of the United Children's Center and two educators from the same center in the village of Tenevo, Tundzha municipality.

2. Key findings

2.1. Key findings from the MDP and IURDP analysis

The study covers 32 Municipal Development Plans 2014-2020 and 1 updated MDP¹.

2.1.1. All plans have been developed in line with the common structure recommended by the Ministry of Regional Development and Public Works - "Methodological guidelines for drafting municipal development plans in the Republic of Bulgaria (2014-2020)", approved with Order № РД-02-14-2402 / 22.11.2011 of the Minister of Regional Development and Public Works. In addition, a special procedure has been announced under Operational Program "Administrative Capacity", where municipalities have been able to apply for expert assistance in the process of drafting Municipal Development Plans. **In 29 of the municipalities surveyed, projects have been implemented and licensed consultancy services have been used for developing the MDPs.** In four municipalities - Shumen, Zavet, Slivo pole and Tvarditsa - there was no data about expert assistance. The consultancy companies have prepared the interim evaluations of the municipalities that have made such assessments in 2016 and 2017. Consultancy firms have also prepared the updated plans for development of the municipalities Tundzha and Borovan.

2.1.2. The plans of all municipalities **contain described monitoring and evaluation procedures**, with planned annual reports and assessment of the implementation of the measures and activities set out in the MDPs. However, only eight municipalities - Aytos, Byala Slatina, Dryanovo, Zavet, Tundzha, Slivo Pole, Sredets and Sungurlare - had annual reports on the implementation of their

¹ The Tundzha website contains only an updated development plan from 2017 and although a visit to the municipality was paid in person by one of the authors of this report, it was not possible to get hold of the MDP initially approved and adopted by the Municipal Council.

MDPs. A significant part of these annual reports are descriptive, non-analytical. Exceptions are the reports of the municipalities Dryanovo and Tundzha.

2.1.3. **All MDPs mention conducting interim evaluations** in 2017-2018, on the basis of which updated MDPs should be developed in accordance with the Methodological Instructions of the MRDPW. Five such interim evaluations were published on the websites of the municipalities: Borovan, Byala Slatina, Dryanovo, Sredets, Tundzha, as well as four updated MDPs, based on these evaluations (except for the municipality of Byala Slatina). Some municipalities may have prepared evaluations and updated MDPs, but have not published them on their websites, although this is considered unlikely. () The demographic, economic and social changes that occurred on the surveyed municipalities' territories were not taken into consideration and therefore the Plans were not accordingly updated (e.g.: Byala Slatina). Therefore, by the end of the planned period, specific measures and activities for social development and social inclusion of vulnerable groups were not considered.

2.1.4. The research found out that the municipalities of Byala Slatina, Dryanovo, Sungurlare and Tundzha conducted preliminary interviews and focus groups with representatives of civil structures and business in the process of developing their MDPs, especially for the part of the socio-economic analyzes. Nevertheless, they did not specify who were the representatives of the civil society and of the businesses targeted and whether there were Roma among them. Other MDPs only outline the need and the mechanism for building partnerships.

2.1.5. The introductions of all MDPs mention that these plans are in line and consistent with many strategies, programs, plans, regulations and other documents at European, national and regional level. There are some plans that list nearly 40 such documents. However, only **in seven municipalities** - Dryanovo, Peshtera, Septemvri, Sliven, Shumen, Tvarditsa, Tundja - **it is explicitly mentioned that the Municipal Development Plan is in compliance with the National Strategy for Roma Integration in Bulgaria 2012-2020** and, respectively, with the Municipal Plans for integration. In other MDPs, such link is not mentioned.

2.1.6. Many of the surveyed MDPs do not contain any analysis of the needs and problems of the Roma communities. The Roma communities are mentioned in the sections with demographic and social analysis, as far as NSI data on the numbers, and shares of large ethnic groups in the municipality are quoted. There are also separate findings, such as the Roma having the lowest level of education, with the highest risk of early dropping out of school, with the highest proportion of children born from underage single mothers, having the lowest economic activity, with the worst housing problems etc. Another section, which sometimes mentions the Roma, is the **SWOT analysis**. There, **the Roma are most often presented in the section "weaknesses" and "threats"**. For example, the Sungurlare MDP refers to "the deteriorating characteristics of the population - age, **ethnic** and educational structure". The beginning of the MDP of Cherven Bryag includes following mentioning: "Basic recommendations on the demographic situation: ... **taking measures related to the trend of increasing the relative share of the Roma population**". There is also indicative evidence for the **common belief that the increase in the share of Roma in the structure of the municipal population was a threat**. For example, Borovan municipality's updated MDP of 2018 notes the following: "**The majority of the live-born children in the last years are of Roma origin, fact which will affect the future change in demographic indicators**". Further on, it is clarified that "about one-third of the children are Roma by expert judgment". The

Roma are presented entirely as a threat in the analytical sections of the MDPs of the municipalities of Sliven and Sredets.

2.1.7. The Roma are considered a **demographic resource** with favorable birth rates and age structure in the demographic and SWOT analyses of MDPs of Aitos and Tundja municipalities. In three of the municipalities - Belovo, Isparih and Kaolinovo - the Roma communities are not mentioned at all. In Bratsigovo, Byala Slatina and Samokov, only the number of Roma and their share are mentioned. A more complete picture of Roma problems is available in the MDPs of Aytos, Dryanovo, Peshtera, Septemvri, Shumen and Tvarditsa. Only the MDPs of municipalities of Tundzha, Dryanovo, Tvarditsa and Lukovit demonstrate a clear awareness from the part of local authorities about the seriousness of the problems of the Roma community, the need of an integrated approach for solving the main issues and the need to include them in the overall local policy. In the updated MDP of Tundzha municipality the focus is not on the ethnicity of the vulnerable groups but rather on the causes for their vulnerability: Bulgarians are a vulnerable group because they are aging or old population, while the young Roma group is vulnerable due to social exclusion in previous periods. Therefore, all measures to increase access to education, health, employment, cultural development, social assistance and care are targeting all the residents of the municipality and all the people in need. There is also a constant monitoring of the activities of the municipal administration and the local institutions, which is aimed at preventing social exclusion and to provide integrated services for solving the problems of all vulnerable persons and groups. The municipality of Tundzha has been working for 10 years to improve the living conditions of the population for a higher quality of life and personal development. Moreover, they build up and expand their measures and activities and the number of families covered by integrated services, is constantly increasing.

2.1.8. **None of the municipalities made any attempt to analyze the factors / reasons for the persisting problems of the Roma communities. Some of the municipalities even have their own interpretations of these issues such as: "ethnicity", "traditions", "low health culture", "low gender culture", "bad work habits of the Roma population", "lower educational potential of the Roma ethnic group"** (Boychinovtsi, Maglizh, Krivodol, Sliven, Sopot, Sredets, Cherven Bryag). Thus, the consequences of the centuries of social exclusion of Roma are presented as cultural/ethnic characteristics of their group; Roma are not seen as victims of discrimination and social exclusion but as the sole responsables of their own condition and problems and, moreover, a threat to the local community and the development of the municipality.

2.1.9. Some municipalities, such as Boychinovtsi, Tvarditsa, Samokov and in the municipalities with relatively large urban centers such as Dobrich, Sliven, Shumen (with IURDPs), made **an attempt to identify the problems at a micro-territorial level** - a quarter or a neighborhood in their MDPs. Some of them, just mentioned villages / neighborhoods / streets, which are mostly identified as inhabited by Roma, characterized by a greater concentration of problems. Only the MDP of Tvarditsa municipality demonstrates a differentiated consideration of the problems in the different micro-territories and it also it offers its perspective on the quarters and neighborhoods that are in biggest risks for ghettoisation.

2.1.10. Although the infrastructure problems of the Roma neighborhoods have been considered more thoroughly in the IURDP compared to the MDPs, there is no indication that the municipalities have undertaken a deeper analysis of the problems and needs of the Roma. Moreover, there is no

information that any Roma community members contributed in any way to the preparation of these analyses, as well as in the preparation of the IURDPs. The municipalities of Dobrich and Shumen define the Roma neighborhoods in their IURDPs as impact zones with "predominantly social character" and include a number of infrastructure improvement measures being planned, such as street repairs and construction of sports fields and playgrounds. Presently, however, both Shumen and Dobrich municipalities have not yet done anything in this direction. The mentioned infrastructure projects / plans in the Roma neighborhoods are predominantly at the border between the Roma neighborhoods and the neighboring quarters.

2.1.11. Almost all MDPs include planned measures targeting vulnerable groups (and, by assumption, also targeting the Roma community) such as *"Encourage entrepreneurship to start and develop economic activities in new SMEs. The scope of activities includes ... social entrepreneurship for the unemployed, people with disabilities and persons from disadvantaged groups"*. Such "measures" sound very common and, as a rule, are not tied to specific resource commitments. Typically, they fall under the priority "Social, human resources and capital development" and are generally defined as *"measures to improve access to employment and job quality"; "Improving access to education and raising the educational level of the population", „Improving the quality of education and creating conditions for equal access to education (including persons from vulnerable groups)", "Reducing the number of early school leavers", "Lifelong learning and full personal development", "Acquisition of Competencies in Accordance with Labor Market Requirements", "Support for the prevention of dropping out of the labor market", "improving the quality of educational services", "enhancing the social integration of disadvantaged people, including people exposed to social exclusion and minorities", "effective prevention of social exclusion and reducing poverty, improving quality and access to public services, etc.* Undoubtedly, such measures are extremely necessary, but **the way they are presented shows that they have rather wishful character and they can be defined as tasks or as priorities rather than as measures in the proper sense of the word.** In some municipalities, the measures envisaged are clearly insufficient and inadequate to address the big number of persisting problems of the Roma communities. For example, according to expert estimates, in the municipality of Sliven, the Roma constitute more than 20% of the population. They are characterized by the highest infant mortality rate and the highest early birth rate in the country. They have very poor health status, very limited access to healthcare due to a massive lack of health insurance and poverty.: The housing conditions are very poor in the urban ghetto "Nadezhda" and in some rural ghettos (which is a factor of low health status). These compact communities have extremely low educational and employment level, very low income etc. The envisaged health care measures in these communities are however limited to the following: *"Addressing the problems of unequal access of large numbers of the Roma population to hospital and non-hospital care is linked to the need for targeted health measures in the 2014-2020 period. Their main focus should be on enhancing the health culture of vulnerable groups of society and ensuring equal access to healthcare facilities by conducting information and preventive health campaigns."*

2.1.12. In more than half of the MDPs of the surveyed municipalities **there are no projects aimed at the Roma community and other vulnerable groups.** In the MDPs, where there are any projects, **they are described as activities that need to be implemented without indicating where the resources are going to come from, what is the commitment of the municipality, who will be responsible for their implementation, what results are expected etc.** Even where specific

projects are planned, there is no allocated funding and the expectation is to seek money from operational and other European programs, and there is no financial commitment from the municipalities.

2.1.13. The analysis of the MDPs and some annual municipal reports shows that **some local administrations still need training and qualification for developing their organizational capacity and sensitivity to vulnerable groups.** The reports often look like long lists of activities and projects, inadequate measures and quantitative indicators that do not provide information about the impact of activities and progress in achieving the objectives and tasks. These reports often have no priorities, everything is presented in bulk. There is no clear assessment of what has been achieved.

2.1.14. **The Methodological Guidelines of the MRDPW for planning and structuring a system of impact indicators and result indicators are not observed in almost all of the surveyed MDPs.** Only in the MDP of Sungurlare municipality and the updated MDP of Tundzha there are some quantified impact indicators.

2.1.15. The majority of the surveyed MDPs have a logical link between the analysis, objectives, priorities, measures, plan of activities and budget. However, this does not apply to activities targeting vulnerable ethnic minorities. The reason is that these groups are missing in the analytical part and appear only in the action plan. Therefore, it is impossible to find a logical link between these parts and, accordingly, to assess the adequacy and effectiveness of the proposed measures and activities. The MDPs of Peshtera and Septemvri municipalities are exceptions, as they contain detailed description of the problems and deficits of the Roma community. Nevertheless, Peshtera has only one concrete measure planned for addressing all issues, while Septemvri has none.

2.2. Key findings from the interviews with experts

2.2.1. The majority of staff members of the municipal administration and the local institutions do not know at all or have only partial knowledge of the MDP as strategic document, although they know that such a document exists, and some have helped to draft it, and possibly participated in drafting the interim evaluation of its implementation. The MDP is perceived as an inevitable bureaucratic necessity, as a document required by the regulations and by the higher authority. It is not perceived as a strategic / basic document for the policy development of the municipality. Another finding is that if there is no staff in the municipality who is directly responsible for preparing annual reports for the implementation of MDP, such reports are not prepared at all. In general, the activities carried out in the municipality depend more on the local strategies of the local authorities and the plans and intentions of the mayor of the municipality without seeking compliance with the MDP.

2.2.2. Hiring licensed companies to prepare MDPs, interim evaluations of their implementation and the updated MDPs **leave a very limited place for experts from the local authorities / institutions and for the members of the civil society (including Roma experts) on the ground to participate in the design of the MDPs and in their monitoring and evaluation. This fact is becoming an obstacle for the perception of ownership of these normative documents by the people on the ground.** As a rule, one of the deputy mayors in the municipalities is entrusted by the mayor with all the logistics of the MDP preparation. They make sure that the necessary

information is provided to the consultancy firm for preparing the MDP by assigning operational tasks to the experts in the municipality:

- collection, primary processing, storage and archiving of data on the economic development of the municipality, on the structure and main economic indicators of industrial, commercial and agricultural enterprises, institutions and firms, providing educational, health, social, cultural, infrastructure, transport, repair and other services to the population;
- collection, primary processing, storage and archiving of strategic documents adopted by the municipal council, protocols and reports on their implementation; the priorities and objectives of the mayor and protocols and reports related to their implementation;
- logistical assistance in conducting surveys for the needs / basic problems of residents and social partners;
- organization of meetings with local social partners to inform them about the main characteristics of the MDPs and the progress in the implementation of the planned measures and projects;
- review the initial version of the mid-term evaluation of the consulting firm, provide notes and suggestions for the editing of the mid-term evaluation.

2.2.3. The information provided by the municipal experts is taken into account by the consultancy companies only as far as it complies with the objectives, priorities and measures outlined in the Regional Development Plans and in the National Strategy for Regional Development both when developing the MDPs and the interim evaluations. The consultancy companies are not interested in how important are the rest of the priorities and measures for the local community and for the local authorities.

The chief experts in Tindzha municipality shared that they actively participated in the preparation of 2013 MDP elaboration and of its interim evaluation in 2017. Prior to the adoption of the interim evaluation by the municipal council, they were entrusted with reading the sections related to the evaluation of activities related to their departments and competence, including the changes in planned measures and the indicators for impact assessment and results. They have worked thoroughly to indicate inaccuracies, significant omissions, incorrect interpretation of data and unjustified assessments. In some places, they proposed a complete editing of separate sections and have written pages in which they presented more precisely the specificities of the municipality, the problems, the specific measures and the projects implemented in response and the achieved results. However, they are unaware about which of their editing suggestions and additions have been taken into account by the consultanting company experts and what is the final version of the updated plan which was submitted for approval to the Municipal Council a week later.

A discussion with the representatives of the local authorities in the municipality of Nikola Kozlevo gave the same impression; that the MDP is not the most well-known and used document in the municipality. Everyone knows that this document exists, but since its adoption in 2014, it has not been reviewed, evaluated or updated. The whole work on the plan was taken over by the experts of an external firm, and the commitments of the employees in the municipality were limited: to provide access to information, to communicate, to accept the plan. For this reason, the municipal staff members have no serious interest in it. In principle, there is an obligation to report the plan's achievements on an annual basis, but since there is no one responsible for it, no report has been written so far. Until now, no one has requested such reports from the municipality.

2.2.4. All activities related to the social inclusion of Roma are outlined in local strategies for the integration of vulnerable groups; to prevent early school leaving; to reduce youth unemployment; to improve housing conditions etc. that are in line with regional and national strategies. **The mayor's and local administration's annual reports are based on the assessment of the implementation of objectives, tasks, priorities and measures under these local strategy papers, rather than the MDP.** Roma specialists usually participated in their elaboration, implementation, monitoring and annual evaluation. The group of Roma specialists includes health, school and social mediators, and sometimes the pastor of the evangelical church. The interviewed experts do not know whether these specialists have been involved in any way in the development of the MDP.

2.2.5. Interviewed deputy mayors and experts know well the problems of people in the municipality and personally know a large number of people and families who benefitted from integrated social services and measures. The deputy mayors and the municipal experts are the people who demand the change of priorities: from economic development to human development and improvement of the quality of life. They are the initiators of all new projects and measures and they believe that these measures will only have an effect if they are integrated into a package of integrated measures and services geared towards improving living conditions of people, increasing employment, reducing poverty, facilitating early childhood development, improving access to quality education, preparing for transition from school or social assistance to employment, providing health care, care for the elderly, the lonely and the people with special needs. They have a comprehensive vision for the development of the municipality and, in particular, the sectors they deal with: education, health, social policy, employment and poverty reduction, culture etc. **They should be more closely involved in the development of MDPs, in the interim evaluation and the updating of plans.** To do so, they may need to undergo additional trainings, but this will only strengthen their capacity and the capacity of the local authority as a whole.

2.2.6. The interviews with Roma parents showed two important things:

2.2.6.a. The Roma in the municipality of Tundzha are aware of the fact **that in recent years important positive changes in the municipality took place.** These changes are mainly related to improved access to early childhood development, regular and vocational education; with better prophylactic health care thanks to school health care and projects aimed at the prevention of certain social and contagious diseases as well as projects to prevent unwanted pregnancies; with better opportunities for treatment and poverty reduction as a result of the provided integrated services;

2.2.6.b. Increasing confidence of the Roma community in the local institutions / authorities, is demonstrated – in the case of Tundzha - by enhancing parental commitment to school success for children, through higher enrollment and attendance rates of the children in nurseries and kindergartens, by the gradually reduced number of early school dropouts and the increasing the number of youth completing vocational education and finding stable employment after graduation. Moreover, this is further demonstrated through the increasing share of families benefiting from a package of integrated social, educational and health services that seems to help them cope with their problems.. As an example, two young mothers belonging to the traditional Kalaydzhi sub-group (tin-smiths), with five children each, at the time of the interview were planning to go to the UK and respectively Bourgas where their husbands have found employment. They said they would

have to return to the village if they will encounter difficulties in enrolling their children in a nursery or kindergarten. The positive trend in young people's attitudes and behaviours can and should be quantified as target indicator for advancement in a municipality. All the above-mentioned examples can be considered when assessing the impact and effectiveness of the MDP implementation. That is why the capacity building of the local and regional authorities on how to adequately develop MDPs and other strategic documents, as well how to plan and conduct their monitoring and evaluation is of outmost importance.

3. Conclusions and recommendations

A very high number of the surveyed MDPs, almost all surveyed interim evaluations and all updated MDPs are prepared by external consultancy firms. The limited involvement of the local authorities' experts and civil society structures (including Roma experts) in the development, monitoring and evaluation of MDPs is becoming an obstacle for recognizing these normative documents as their "own". As a result, the representatives of the local authorities, local institutions and civil society structures have poor knowledge about these strategic documents.

Sometimes, the information provided by municipal experts is taken into account by the consulting firms only to the extent in which they coincide with the objectives, priorities and measures outlined in the Regional Development Plan and in the National Strategy for Regional Development. This is valid both when developing the MDPs and the interim evaluations for the implementation of MDPs. The consulting firms are not interested in what are the important matters for the local community and for the local authorities and what would be their suggestions for priorities and measures for addressing the real needs of the local communities.

It is essential to involve more actively the representatives of local administrations, institutions and NGOs / local Roma experts in the design, implementation and evaluation of MDPs. For this purpose, it will be necessary to increase the capacity of these specialists to elaborate, monitor and evaluate the implementation of the municipal plans.

The MDPs describe the changes in Europe 2020 targets and priorities, but the inertia of the previous planning period for developing MDPs in 2013 has remained too strong and the new guidelines are not being met everywhere. In many MDPs 2014-2020, the consultancy firms continued to focus on the development of the human capital as a prerequisite for economic development rather than on human development opportunities and a higher quality of life. This limits the possibilities for planning and financing adequate measures for human development, it predetermines their place only as subordinate to the economic development. With this perspective, there is an increasing risk of not planning and financing necessary measures aimed at integrating vulnerable persons and groups, unless a clear economic need for increasing the human capital is demonstrated.

In the introductory part of all MDPs it is written that they are consistent, agreed and in line with a number of strategies, programs, plans, regulations and other documents at European, national and regional level. However, only in seven municipalities from those surveyed (Dryanovo, Peshtera, Septemvri, Sliven, Shumen, Tvarditsa and Tundzha) it is explicitly mentioned the fact that the Municipal Development Plan is in compliance with the National Strategy for Roma Integration in Bulgaria 2012-2020 and respectively with the Municipal Action Plans for Roma Integration. There is no such link mentioned in the rest of the MDPs.

In this regard, it is needed to include the National Roma Integration Strategy (NISR) in the list of mandatory strategic documents to be complied with when developing the regional development plans. This will increase the likelihood of such coordination and compliance when developing the MDPs, as well.

In a big number of MDPs there is no analysis of problems and needs assessments of the Roma communities, living in the territories of the respective municipalities. In the analytical part of the MDPs, the Roma communities are mainly presented in the sections of demographic and social analysis, as far as NSI data on the distribution of large ethnic groups in the municipality are quoted. There are also separate findings such as the “Roma have the lowest level of education with the highest risk of early drop out of school, with the highest proportion of children born out of wedlock and of underage mothers, with the lowest economic activity and employment, with the worst housing problems”. Another section, which sometimes mentions the Roma, is the SWOT analysis. There, the Roma are most often presented in the section on weaknesses and threats. As a demographic resource with favorable birth rates and age structure, the Roma are considered only in the demographic analyses and SWOT analyses of Aitos and Tundzha municipalities.

None of the municipalities made an attempt to analyze the factors for the persisting problems of the Roma communities. About one fifth of the MDPs explain as reasons for the problems of the Roma, their "ethnicity", "traditions", "low health culture", "low gender culture", "poor working habits of the Roma population", "lower educational potential of the Roma ethnic group" etc. Therefore, the consequences of centuries of social exclusion of Roma communities are presented as cultural / ethnic characteristics of their group; Roma are not seen as victims of discrimination and social exclusion, but they are rather seen as the sole responsible of their own situation and problems. Moreover, they are seen as a threat to the local community and the development of the municipality.

It is necessary to raise the awareness and sensitivity about the problems of vulnerable ethnic groups, as well as to build the capacity of local authorities for defining adequate measures for addressing and solving these issues. In communities with multi-dimensional decline, it would be important to have such measures targetting everyone, not just the vulnerable communities, in order to ensure their social acceptance and the sustainable development of the local community.

Measures for social development and integration of vulnerable communities are formulated too broadly in the MDPs. They are presented as goals, tasks, intentions rather than concrete measures. Since municipal development plans are being prepared at the end of the previous planning period, there is no available information about the amounts of the expected funds under the European programs and also there is no information as yet about whether the submitted municipal project proposals will be funded under these programs. For this reason, the majority of the MDPs do not include specific projects / measures for the integration of vulnerable ethnic groups. This is one of the main reasons why MDPs need to be updated in the middle of the planning period, as regulated in the Methodological Guidelines for Developing of Municipal Development Plans. Such an update of the MDPs, however, is an exception rather than a rule in the monitored municipalities and it was implemented only in one out of seven of the surveyed municipalities. Annual reports on the implementation of MDPs have only one quarter of surveyed municipalities.

Therefore, it is essential to strengthen the monitoring and control of the process of developing interim evaluations of MDPs and also of the process of updating the MDPs, based on these

evaluations. There is also a need to strengthen the monitoring and control of the implementation of the MDPs.

The lack of sufficient information about the funds, agreed under the EU Operational Programs and expected by municipalities, as well as, the lack of preliminary information about the forthcoming revenues in local and national budgets, makes it difficult to assess the effectiveness of the envisaged policies and measures for the integration of vulnerable ethnic groups (as far as such policies and measures are specifically defined in the MDPs).

None of the surveyed MDPs observed the requirements of the “Methodical Guidelines for Planning and Structuring a System of Impact Indicators and Result Indicators” by the MRDPW. There are no clear baseline quantitative indicators to be developed or changed, nor quantitative expectations of the results achieved at the mid-term stage or the desired status at the end of the planning period (for example: infant mortality rate at the beginning and end of the planning period, the proportion of the persons who are between 16 - 65 of age with higher and secondary education at the beginning, middle and end of the planning period, share of families with good housing conditions, including water supply, sewerage, good technical infrastructure etc.). Only in the MDP of Sungurlare municipality some quantified impact indicators have been formulated, and the Tundzha municipality updated MDP demonstrates attempts for a more complete correction of this overall disadvantage.

The lack of up-to-date data, disaggregated by ethnicity (e.g.: early birth rates, child and premature mortality, educational level, results from the external assessment in Bulgarian language, mathematics and sciences after the fourth, seventh and eleventh grade, the number of segregated schools and children enrolled, youth unemployment, dropping out of the labor market, access to running water and sanitation, etc.) continue to hamper the assessment of what has been achieved as a result of the policies and measures for the integration of vulnerable ethnic groups, their effectiveness and efficiency.

This situation shows the need for improving and building the capacity of the people who develop the MDPs and also of the evaluators of the implementation of MDPs, especially in defining good quantitative impact and result indicators.